

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON;**
CHEVY SWANSON, an Individual,

Plaintiffs,

vs.

ANA MARI CAUCE, in her official capacity
as president of the University of
Washington; **GERALD J. BALDASTY**, in
his official capacity as provost and executive
vice president; **RENE SINGLETON**,
individually and in her official capacity as
assistant director, Student Activities;
CHRISTINA COOP, individually and in
her official capacity as senior activities
advisor, Student Activities; **JOHN N.
VINSON**, individually and in his official
capacity as Chief of the University of
Washington, Seattle, Police Department;
CRAIG WILSON individually and in his
official capacity as University of
Washington, Seattle, Police Department
Patrol Commander; and DOES 1-25;

Defendants.

NO. _____

**COMPLAINT FOR CIVIL RIGHTS
VIOLATIONS AND RELATED
CLAIMS**

DEMAND FOR JURY TRIAL

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2
3 Plaintiffs University of Washington College Republicans and Chevy Swanson
4 (collectively "Plaintiffs") bring this action against Defendants Ana Mari Cauce,
5 individually and in her official capacity as president of the University of Washington;
6 Gerald J. Baldasty, in his official capacity as provost and executive vice president of the
7 University of Washington; Rene Singleton, individually and in her official capacity as
8 assistant director, Student Activities at the University of Washington, Seattle ("UW
9 Seattle"); Christina Coop, individually and in her official capacity as senior activities
10 advisor, Student Activities at the UW Seattle; John N. Vinson, individually and in his
11 official capacity as Chief of the UW Seattle Police Department; Craig Wilson,
12 individually and in his official capacity as UW Seattle Department Patrol Commander;
13 and DOES 1-25, for nominal, compensatory, punitive, declaratory and injunctive relief.
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16 INTRODUCTION

17 1. This action seeks to protect and vindicate fundamental rights. It is a civil
18 rights action brought under the First and Fourteenth Amendments against government
19 actors responsible for imposing draconian and unreasonable security fees on Plaintiffs
20 as a condition for permitting them to host a conservative speaker in Red Square within
21 the UW Seattle campus. The imposition of a \$17,000 security fee for a Saturday afternoon
22 event featuring an evangelical Christian speaker is remarkable. But UW Seattle justifies
23 it only on the basis of an unconstitutional heckler's veto, in essence, rewarding members
24 of society so intolerant of and hostile to hearing views they find objectionable they must
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1 threaten and/or commit violence to protect themselves from such views. By imposing
 2 such an exorbitantly large security fee on the Plaintiffs, Defendants, and each of them,
 3 are responsible for ratifying an unconstitutional heckler's veto, taxing protected speech
 4 and rewarding those who disrespect the solemn and precious freedoms safeguarded
 5 within the First Amendment.
 6

7 JURISDICTION AND VENUE

8 2. This action arises under the First and Fourteenth Amendments to the
 9 United States Constitution, and is authorized pursuant to 42 U.S.C. § 1983 in relation to
 10 Defendants' deprivation of the Plaintiffs' constitutional rights. Accordingly, this Court
 11 has federal question jurisdiction under 28 U.S.C. §§ 1331, 1343.
 12

13 3. Venue is proper under 28 U.S.C. § 1391(b). Each and all of the acts alleged
 14 herein were done by Defendants within King County, Washington.
 15

16 4. This Court is authorized to grant a Declaratory Judgment under the
 17 Declaratory Judgment Act, 28 U.S.C. §§ 2201-02, implemented through Rule 57 of the
 18 Federal Rules of Civil Procedure, and to issue the injunctive relief requested by Plaintiff under
 19 Rule 65 of the Federal Rules of Civil Procedure; the requested injunctive relief under 28 U.S.C.
 20 § 1343(3); the requested damages under 28 U.S.C. § 1343(3); and attorneys' fees and costs under
 21 42 U.S.C. § 1988.
 22

23 PARTIES

24 A. Plaintiffs

25 5. Plaintiff College Republicans of the University of Washington is a
 26 registered student organization of the University of Washington, Seattle.
 27

1 6. Plaintiff Chevy Swanson is an individual residing in the City of Seattle, a
2 student at the University of Washington, Seattle, and president of the College
3 Republicans of the University of Washington.
4

5 **B. UW Seattle Defendants**

6 7. Defendant Ana Mari Cauce, is sued in her individual and official capacity
7 as president of the University of Washington.

8 8. Defendant Gerald J. Baldasty is sued in his official capacity as provost and
9 executive vice president of the University of Washington.
10

11 9. Defendant Rene Singleton is sued individually and in her official capacity
12 as assistant director, Student Activities, of the University of Washington.

13 10. Defendant Christina Coop, individually and in her official capacity as
14 senior activities advisor, Student Activities, of the University of Washington.
15

16 11. Defendant John N. Vinson is sued individually and in his official capacity
17 as Chief of the University of Washington Police Department.

18 12. Defendant Craig Wilson is sued individually and in his official capacity as
19 Patrol Commander within the University of Washington Police Department.
20

21 13. Plaintiffs are unaware of the true names and/or capacities of defendants
22 sued herein as DOES 1-25 ("UW Seattle DOES") and therefore sue said defendants by
23 such fictitious names. Plaintiffs will amend this Complaint to allege their true names
24 and capacities when ascertained. Plaintiffs believe and allege that each of the DOE
25 defendants is legally responsible and liable for the incident, injuries, and damages set
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1 forth in this Complaint. Each defendant proximately caused injuries and damages
2 because of their active participation in the subject incident, and/or because of their
3 negligence, breach of duty, negligent supervision, management or control, violation of
4 public policy, or tortious conduct. Each defendant is liable for his/her personal conduct,
5 vicarious or imputed negligence, fault, or breach of duty, whether severally or jointly,
6 or whether based upon agency, employment, ownership, entrustment, custody, care or
7 control or upon any other act or omission. Plaintiffs will ask leave to amend this
8 Complaint subject to further discovery and investigation.
9
10

11 **FACTUAL BACKGROUND**

12 14. In January 2017, the College Republicans hosted an event featuring
13 political provocateur Milo Yiannopolous in Kane Hall on the UW Seattle campus. Exh.
14 1, Decl. Swanson, ¶ 3. The event drew significant blowback from members of the
15 community who contacted the University hoping to have the event cancelled. *Id.*
16

17 15. Chevy Swanson was event coordinator for the College Republicans and
18 directly involved in planning for the Yiannopolous event. *Id.*, ¶ 4. Swanson and other
19 club members met multiple times with campus administration. *Id.* Initially, the
20 administration estimated security, building rental, equipment and staffing would cost
21 the group \$1,000. *Id.* In subsequent meetings, they were given a revised estimate of
22 \$5,000 and \$7,000. *Id.* At no time, did the administration officials explain the rising cost
23 estimates except to say that because they were expecting heightened protests, the cost
24 of security would increase to cover additional officers. *Id.*
25
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1 16. On January 20, 2017, the night of the Yiannopolous event, approximately
2 400 people gathered in Red Square to cue up for the event. *Id.*, ¶ 5. At approximately 5
3 p.m., a number of black-clad individuals wearing masks carrying sticks and flagpoles
4 showed up breaking bricks, attempting to bust down barricades and harassing people.
5
6 *Id.*

7 17. At approximately 7 p.m. an altercation occurred in which a protester was
8 shot. Two people were charged with assaulting the protester. *Id.*, ¶ 6. As a result of the
9 Yiannopolous event requiring substantial security, the University adopted a "Safety and
10 Security Protocols for Events" policy. *Id.* The policy states in relevant part:

12 When the use of campus facilities involves events, activities, and
13 programs that are likely to significantly affect campus safety,
14 security, and operation, the University will perform an analysis of
15 all event factors. This could result in additional conditions and
16 requirements placed on the host organization in order to maintain
17 the safety and security of all organizing parties, guests attending,
18 and the broader campus community. Safety and security concerns
19 may include, but are not limited to, history or examples of violence,
20 bodily harm, property damage, significant disruption of campus
21 operations, and those actions prohibited by the campus code of
22 conduct and state and federal law.

23 During the planning process, host organizations or groups are
24 responsible for making the University aware of any known histories
25 and/or issues of safety and security concerns. The University (i.e.,
26 venue coordinator and UWPD) may review all event details and
27 logistics to determine necessary safety and security protocols.
Additionally, if previously unknown or new safety and security
concerns arise during the planning process, the University will
review the event details and may alter any conditions and
requirements. Any determination by authorized campus officials
will be based on an assessment of credible information other than
the content or viewpoints anticipated to be expressed during the
event. Other events taking place on or near campus will be taken into

1 consideration in the security review. Required security measures
2 may include, but are not limited to, adjusting the venue, date, and
3 timing of the event; providing additional law enforcement; imposing
4 access controls or security checkpoints limiting costumes or items
5 carried; and/or creating buffer zones around the venue.

6 The host organization or group will be required to pay costs of
7 reasonable event security as determined in advance by the
8 University. These costs include, but are not limited to security
9 personnel, costs to secure the venue from damage, and special
10 equipment as determined by law enforcement. Security fees will be
11 based on standard and approved recharge rates for UWPD, other
12 security personnel, and associated equipment costs or rentals.
13 Should the University place supplementary security protocols prior
14 to or during the event to provide adequate security to help mitigate
15 any originally unforeseen security concerns, additional security fees
16 may be charged to host organizations or groups. Host organizations
17 are financially responsible for damage, inside or outside of the
18 venue, caused by members of their organization or their invitees.

19 The University reserves the right, in rare circumstances, to cancel an
20 event if based on information available it is reasonably believed that
21 there is a credible threat which unreasonably places the campus
22 community at risk of harm.

23 *Id.*

24 18. The College Republicans raised money to cover the security fees through
25 a gofundme campaign. *Id.*, ¶ 7. After the event, the College Republicans received an
26 invoice from the University for \$9,121, which they paid from the money received from
27 the gofundme campaign. *Id.* However, the College Republicans did not plan other
events in 2017 due to their inability to cover the exorbitant security costs they
anticipated needing. *Id.*

19. In October 2017, an individual associated with Patriot Prayer, Kyle
Broussard, contacted Swanson offering to have the group's founder and leader, Joey

1 Gibson, come to the campus on November 22, 2017, for an indoor speaking event. *Id.*, ¶
2 8. Patriot Prayer is an informal group of evangelical Christians formed and led by
3 Gibson to convey a message of peace. *Id.* Its Facebook page says it is about “using the
4 power of love and prayer to fight the corruption both in the government and citizen
5 levels that seek to gain power through division and deception.”¹ *Id.* Despite this
6 description, Gibson has been the target of physical assault by Antifa and similar violent
7 left-wing activist groups who label him a white supremacist and Nazi. *Id.*
8

9
10 20. In October 2017, Swanson, along with other members of the College
11 Republicans, met with Defendant Renee Singleton, assistant director of Student
12 Activities, and Christina Coop, senior activities advisor for Student Activities, to discuss
13 planning for the Patriot Prayer event. *Id.*, ¶ 9. Defendant Singleton told Swanson that
14 security costs would be high due to security concerns. *Id.* Singleton also told Swanson
15 that Patriot Prayer is a controversial group and would present major security problems.
16 *Id.* Based on those representations, the College Republicans decided not to move
17 forward with the event. *Id.*
18

19
20 21. In January 2018, the College Republicans discussed holding a Patriot
21 Prayer event outdoors to defray the costs associated with room, equipment and some
22 of the security costs. *Id.*, ¶ 10. The group reached out to Gibson to inquire about
23 scheduling an outdoor event in February 2018. *Id.*
24

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26
27 ¹ https://www.facebook.com/pg/PatriotPrayerUSA/about/?ref=page_internal.

22. Swanson met again with campus advisors to discuss planning for a February outdoor event. *Id.*, ¶ 11. On February 1, 2018, Defendant Craig Wilson, Patrol Commander with the UW Seattle Police Department, told Swanson the cost of security would be \$17,000 due to expected violent protests. *Id.* Wilson did not explicitly detail the reasons for such a large security fee. *Id.* No other group has been charged such an excessively large security fee in the past. *Id.*, Exh. 1, UWPD Security Costs for 2016-17, obtained through a Washington State Public Records Request.

LEGAL CLAIMS

FIRST CLAIM FOR RELIEF

Violation of the First Amendment (42 U.S.C. § 1983)
(Freedom of Speech)
(All Plaintiffs Against All UW Seattle Defendants)

23. Plaintiffs incorporate by reference the allegations in the preceding paragraphs, as if fully set forth herein.

24. Red Square is a designated public fora – as it must be, under state-wide regulations, and long-standing Supreme Court precedent. Accordingly, UW Seattle is required to allow plaintiffs to bring speakers of their own choosing to speak on campus, free from viewpoint discrimination, content-based speech restrictions that are not narrowly tailored to serve a compelling government interest, and content-neutral time, place and manner restrictions that are not narrowly tailored to serve an important government interest or that fail to leave open ample alternative channels for the communication of the message.

1 25. Defendants, acting under color of state law and according to UW Seattle
2 policy, custom, pattern, and practice, have failed to meet these constitutional standards
3 by adopting and enforcing a facially and as-applied unconstitutional security fee policy
4 that grants Defendants unfettered discretion to impose unreasonable security fees;
5 which Defendants have enforced according to the their whim and taste, or the demands
6 of an off-campus mob of masked agitators.
7

8 26. Defendants' actions fail to meet constitutional scrutiny because the
9 security fee policy is facially and as-applied unreasonable, and was adopted and
10 enforced in a viewpoint discriminatory manner, with the effect of chilling,
11 marginalizing, or banning the expression of conservative viewpoints on the UW Seattle
12 campus.
13

14 27. The security fee policy is unconstitutionally vague, and therefore void as
15 a matter of law, both on its face, and as it is being applied to Plaintiffs.
16

17 28. As a direct and proximate consequence of Defendants' violation of
18 Plaintiffs' federal civil rights under 42 U.S.C. § 1983 and the First Amendment, Plaintiffs
19 have suffered and will suffer irreparable injury that cannot fully be compensated by an
20 award of monetary damages.
21

22 29. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to
23 declaratory relief and temporary, preliminary, and permanent injunctive relief
24 invalidating and restraining enforcement of the restrictions allowed or required by the
25 security fee policy. Additionally, plaintiffs are entitled to monetary damages arising
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1 from the unconstitutional actions of Defendants and each of them, sued herein in their
2 individual capacities, as well as reasonable costs of suit.

3
4 30. Plaintiffs found it necessary to engage the services of private counsel to
5 vindicate their rights under the law. Plaintiffs are therefore entitled to an award of
6 attorneys' fees pursuant to 42 U.S.C. § 1988.

7
8 **SECOND CLAIM FOR RELIEF**

9 Violation of the First Amendment (42 U.S.C. § 1983)
10 (Freedom of Assembly)
11 (All Plaintiffs Against All UW Seattle Defendants)

12 31. Plaintiffs incorporate by reference the allegations in the preceding
13 paragraphs, as if fully set forth herein.

14 32. The First Amendment prohibits government from abridging the right of
15 the people to assemble peaceably. Freedom of assembly is the individual right or ability
16 of people to come together and collectively express, promote, pursue, and defend their
17 ideas. The right to freedom of association is recognized as a human right, a
18 political right and a civil liberty.

19 33. Defendants, and each of them, abridge Plaintiffs' right to assemble by
20 imposing a draconian and unreasonable security fee for their scheduled event, thereby
21 creating and enforcing a de facto prohibition on their right to assemble without
22 government-approved endorsement of their message.

23
24 34. As a direct and proximate consequence of Defendants' violation of
25 Plaintiffs' federal civil rights under 42 U.S.C. § 1983 and the First Amendment, Plaintiffs
26

1 have suffered and will suffer irreparable injury that cannot fully be compensated by an
2 award of monetary damages.

3 35. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to
4 declaratory relief and temporary, preliminary, and permanent injunctive relief
5 invalidating and restraining enforcement of the restrictions allowed or required by the
6 security fee policy. Additionally, plaintiffs are entitled to monetary damages arising
7 from the unconstitutional actions of Defendants and each of them, sued herein in their
8 individual capacities, as well as reasonable costs of suit.
9
10

11 36. Plaintiffs found it necessary to engage the services of private counsel to
12 vindicate their rights under the law. Plaintiffs are therefore entitled to an award of
13 attorneys' fees pursuant to 42 U.S.C. § 1988.
14

15 **THIRD CLAIM FOR RELIEF**

16 Violation of the First Amendment (42 U.S.C. § 1983)
17 (Retaliation)
18 (All Plaintiffs Against All UW Seattle Defendants)

19 37. Plaintiffs incorporate by reference the allegations in the preceding
20 paragraphs, as if fully set forth herein.

21 38. Plaintiffs and their members have engaged in constitutionally protected
22 speech, namely, holding and expressing conservative viewpoints by inviting
23 conservative speakers to speak on the UW Seattle campus.
24

25 39. By treating Plaintiffs and their members differently from similarly
26 situated students, student organizations, and members of the public because they are
27

1 conservative and because of their conservative beliefs, among other things, Defendants,
2 acting under color of state law and according to policy and practice, have retaliated
3 against Plaintiffs and their members for holding and expressing disfavored views, and
4 in so retaliating, have engaged in conduct that would chill a person of ordinary firmness
5 from continuing to engage in the protected speech activity.

7 40. Plaintiffs and their members' actions in holding and expressing
8 disfavored views was a substantial and motivating factor in Defendants' retaliation
9 against them by imposing unlawful restrictions on Plaintiffs and their members' federal
10 civil rights secured under 42 U.S.C. § 1983 and the First Amendment, causing Plaintiffs
11 to suffer and continue in the future to suffer irreparable injury that cannot be fully
12 compensated by an award of monetary damages.

14 41. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to
15 declaratory relief and temporary, preliminary, and permanent injunctive relief
16 invalidating and restraining Defendants' retaliation against BCR and its members for
17 their utterances of protected speech.

19 42. Additionally, Plaintiffs are entitled to monetary damages arising from the
20 unconstitutional actions of Defendants, and each of them, sued herein in their
21 individual capacities, as well as reasonable costs of suit.

23 43. Plaintiffs found it necessary to engage the services of private counsel to
24 vindicate their rights under the law. Plaintiffs are therefore entitled to an award of
25 attorneys' fees pursuant to 42 U.S.C. § 1988.

FOURTH CLAIM FOR RELIEF

Violation of the Fourteenth Amendment (42 U.S.C. § 1983)
(Due Process)
(All Plaintiffs Against All UW Seattle Defendants)

44. Plaintiffs incorporate by reference the allegations in the preceding paragraphs, as if fully set forth herein.

45. Defendants, acting under color of state law and according to a policy, pattern and practice, have enacted a security fee policy, which is vague, overbroad, and improperly affords Defendants unfettered discretion in its application, and therefore deprives Plaintiffs of their clearly established due process rights guaranteed by the Fourteenth Amendment to the United States Constitution.

46. As a direct and proximate consequence of Defendants' violations of Plaintiffs federal civil rights under 42 U.S.C. § 1983 and the Fourteenth Amendment, Plaintiffs have suffered and will suffer irreparable injury that cannot fully be compensated by an award of monetary damages.

47. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief invalidating and restraining enforcement of the security fee policy. Additionally, Plaintiffs are entitled to monetary damages arising from the unconstitutional actions of Defendants, and each of them, sued herein in their individual capacities, as well as reasonable costs of suit.

1 48. Plaintiffs found it necessary to engage the services of private counsel to
 2 vindicate their rights under the law. Plaintiffs are therefore entitled to an award of
 3 attorneys' fees pursuant to 42 U.S.C. § 1988.
 4

5 **FIFTH CLAIM FOR RELIEF**

6 Violation of the Fourteenth Amendment (42 U.S.C. § 1983)
 7 (Equal Protection)
 8 (All Plaintiffs Against All UW Seattle Defendants)

9 49. Plaintiffs incorporate by reference the allegations in the preceding
 10 paragraphs, as if fully set forth herein.

11 50. By treating Plaintiffs and their members, differently from similarly
 12 situated students, student organizations, and members of the public because they are
 13 conservative and because of their conservative beliefs, among other things, Defendants,
 14 acting under color of state law and according to policy and practice, have engaged in
 15 actions that discriminate on the basis of political status and belief and have therefore
 16 deprived Plaintiffs of their clearly established equal protection rights guaranteed by the
 17 Fourteenth Amendment to the United States Constitution.
 18

19 51. As a direct and proximate consequence of Defendants' violations of
 20 Plaintiffs' federal civil rights under 42 U.S.C. § 1983 and the Fourteenth Amendment,
 21 Plaintiffs have suffered and will suffer irreparable injury that cannot be fully
 22 compensated by an award of monetary damages.
 23

24 52. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to
 25 declaratory relief and temporary, preliminary, and permanent injunctive relief
 26
 27

1 invalidating and restraining enforcement of the security fee policy. Additionally,
2 Plaintiffs are entitled to monetary damages arising from the unconstitutional actions of
3

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs respectfully pray for relief and judgment against
6 Defendants, jointly and severally, as follows, in amounts according to proof:
7

- 8 1. For judgment in favor of Plaintiffs against Defendants;
- 9 2. For all damages legally and/or proximately caused to Plaintiffs by
10 Defendants in an amount to be determined at trial;
- 11 3. For a declaration that Defendants * DOES violated 42 U.S.C. § 1983;
- 12 4. For a declaration that Defendants * violated the First and Fourteenth
13 Amendments to the United States Constitution;
- 14 5. For a declaration that Defendants * violated the First and Fourteenth
15 Amendments to the United States Constitution;
- 16 6. For nominal damages for the past loss of their constitutional rights as set
17 forth in this Complaint;
- 18 7. For compensatory damages according to proof;
- 19 8. For punitive and exemplary damages for all claims for which such
20 damages are authorized;
- 21 9. For temporary, preliminary, and permanent injunctive relief requiring *;
- 22 10. For civil penalties under Cal. Civ. Code §§ 51.7, 52 & 52.1;
- 23
- 24
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11. For an award of reasonable attorneys' fees, costs and expenses pursuant to 42 U.S.C. § 1988 other applicable law;

12. For costs of suit incurred herein; and

13. For such other and further relief as the Court deems just and proper.

DATED this February 6, 2018

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s/ Kyle D. Netterfield

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FREEDOM X

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DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs * demand trial by jury on all individual claims they bring against their attackers in this action of all issues so triable.

ELLIS, LI & McKINSTRY PLLC

s/ Kyle D. Netterfield

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